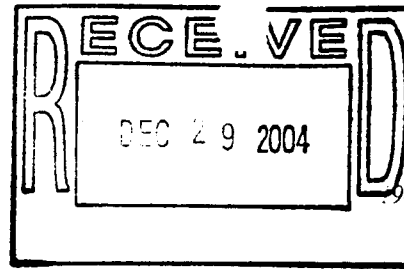




CALIFORNIA  
COTTON  
GINNERS AND  
GROWERS  
ASSOCIATIONS



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Telephone: 559 / 252-0684  
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December 22, 2004

Mr. Michael Leao  
Supervisor, Plastic Recycling Technologies Section  
California Integrated Waste Management Board  
P.O. Box 4025  
Sacramento, CA 95812

Re: **Comments on the Final Draft Plastic Trash Bag Legislative Report – Dated  
December 17, 2004**

Dear Mr. Leao,

On behalf of the cotton industry in California, thank you for the opportunity to provide comments on the California Integrated Waste Management Board's final draft of the "Comprehensive Film Plastic Diversion and Management Action Plan and Plastic Trash Bag Program", dated December 17, 2004. As you are aware, our organization submitted comments on October 13, 2004 and December 8, 2004 on the previous version of the report. Unfortunately, our comments were not addressed in the December 17<sup>th</sup> version. To the contrary, our comments were misrepresented in the "Response to Comments" document provided with this latest draft. Not addressing our issues is one thing, but publicly attributing our name as supportive of a tax on our industry members is inexcusable. We request that your department correct this immediately and issue an apology to the leadership and membership of our organization.

To be perfectly clear, the California Cotton Ginners and Growers Associations wholeheartedly oppose the staff's proposal to impose a mill tax on plastic, and the semblance of any thing like it. Businesses in California, especially those in our industry, are already over-taxed compared to other states and countries, making it difficult to compete in the world marketplace.

As it relates to the December 17<sup>th</sup> report, we believe more time is needed for all stakeholders to analyze staff's proposal to create MOUs with manufacturers, distributors, etc. In particular, we need time to determine how such an MOU might or might not work and the impact that it will have on our members, the end users.

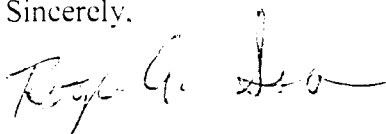
Notwithstanding the fact that we have not fully evaluated your latest proposal, we want to reiterate the points previously made as to why agriculture, and cotton in particular, should

be exempted from any program that proposes to tax plastic. First, the U.S. Code of Federal Regulations, Title 7 Chapter XIV, part 1427, Subpart A. Section 1427.5 clearly states that for cotton to be eligible for the federal loan program, it must be packaged in materials which meet the specifications adopted by the Joint Cotton Industry Bale Packaging Committee. These specifications dictate the use of only 100% virgin materials for polyethylene and polypropylene bags.

Second, 85% of California's cotton is exported overseas, with the remaining 15% shipped to textile mills on the eastern seaboard of the United States. Not one single bale of California cotton is used in California. Consequently, the plastic bagging used to cover approximately 72% of the cotton grown and baled in California will not end up in California landfills because it is shipped out of state.

Your immediate attention to the aforementioned issues is greatly appreciated. Should you have any questions, please contact me at (559)252-0684.

Sincerely,



Roger A. Isom  
Vice President and Director of Technical Services

- c. Senator Roy Ashburn
- Senator Chuck Poochigian
- Assemblyman Bill Maze
- Assemblyman Kevin McCarthy
- Assemblywoman Nicole Parra
- Rosario Marin, CIWMB Chairperson